February 28, 1981



Division of Air Pollution Control Illinois Environmental Protection Agency 2200 Churchill Road Springfield, IL 62706 Man Orașe Sean Sene o B**e**unsara**n**

ATTENTION: Bharat Mather

Gentlemen:

SUBJECT: AIR PERMIT RE-EVALUATION, APPLICATION NO. 63101002

I.D. NO. 197015AII

Process Alliance Partnership (PAP) received your February 23 letter stipulating denial of the subject permit. Immediate telephone conversations were undertaken with Jim Cobb and Cy Levine of the IEPA Air Pollution Division. Further telephone conversations were unsuccessfully attempted with Tom Cavenaugh and Gene Thios of the IEPA Division of Land/Noise Pollution Control. The subject matter of these conversations as related to Messrs. Cobb and Levine and as was not related to Messrs. Cavenaugh and Thios because of their unavailability, was as follows:

- 1. PAP storage tanks, in which the PAP process oil separation takes place, are equipped with control equipment. The control equipment consists of closed covers which achieve essentially 100 percent control. Operational transfers to and from these tanks take place by means of a closed circuit, vapor recirculation system. Oil unloading from these storage tanks takes place typically once a week or less, for periods of approximately one hour on the average, and in quantities less than or equal to 5000 gallons. Such oil unloading is made by means of vacuum to a licensed tank trailer and ultimately sold to an oil processor.
- 2. Rule 102 is not applicable to PAP, based upon the advice of PAP's legal counsel, for the following reasons:
 - a. PAP's alleged odor is not a specified air contaminant as defined in Rule 101 of IPCB Rules and Regulations, Chapter 2, and
 - b. PAP's alleged odor is not due to any inedible rendering process
 - c. PAP's alleged odor is not contributary to the maintenance or lack of maintenance of any ambient air quality standard

Division of Air Pollution Control February 28, 1981

3. Inasmuch as paragraphs 1 and 2 above were the reasons given for denial and inasmuch as a continuance of this denial beyond March 3 will cause PAP to lose their contract with their only client and thus their business and cause great financial loss, PAP respectfully requests an immediate re-evaluation, reversal and re-examination of PAP's air permit application.

Sincerely,

Donald E. Matschke, President

D.E.MATSCHKE COMPANY, Partner

PROCESS ALLIANCE PARTNERSHIP

PROCESS ALLIANCE PARTNERSHIP 608 Railroad Street Joliet, IL 60436

CC- Tom Cavenaugh